

DEPT. OF TRANSPORTATION
DOCKET SECTION

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98 JUN 22 PM 2: 52

Wednesday, June 17, 1998

Docket Clerk
U. S. DOT Dockets
Room PL - 401
400 Seventh St., SW
Washington, DC 20590 - 0001

Re: FHWA - 98 - 3637 - 3

Gentlemen:

I am writing **in support of granting** the 12 vision waivers listed in your Federal Register notice, Wednesday, June 3, 1998.

Like some of the applicants, I have suffered from amblyopia ("lazy eye") since childhood. It has not prevented me from maintaining a safe driving record for 31 years.

The Federal Motor Carrier Safety Regulations (FMCSR) require commercial drivers to have their eyes tested individually ("each eye"). We drive, though, with both eyes open simultaneously and working together. Testing the two eyes together (the way we drive) often yields a better visual acuity than the 20/40 required, even if one of the eyes tested separately fails to meet this standard.

The drivers listed in your notice have demonstrated an ability to drive safely in spite of not meeting the rather arbitrary standard contained in the FMCSR. Denying them the privilege of driving, because of visual impairments which do not affect their ability to drive, would be nothing short of handicap discrimination.

Please give final approval to these applications you have given preliminary approval to, and consider eliminating the "each eye" language in the FMCSR.

Sincerely,

Roger Sproul